

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CELESTE V. URENA

Civil Action No.: 12 CV 5078

Plaintiff,

- against -

ANSWER

ROSS METALS CORP., JACK ROSS
and KAREN ZAKARIAN, individually,

Defendants.
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Defendants Ross Metal Corp., Angel Ross, also known as Jack Ross and Karin Zakarian by their attorney, Richard N. Golden, answering the Complaint in this action as follows:

I
ADMISSIONS AND DENIALS

1. Defendants admit the allegations set forth in paragraph "1" of the Complaint.
2. Angel Ross also known as "Jack" Ross is the president of Ross Metals Corp.
There is no recognized title of "CEO".
3. Angel Ross, also known as "Jack" Ross is the sole shareholder of Ross Metals Corp.
4. Defendants admit the allegations set forth in paragraph "4" of the Complaint.
5. Defendants admit the allegations set forth in paragraph "5" of the Complaint.
6. Defendants admit the allegations set forth in paragraph "6" of the Complaint.
7. Defendants deny the allegations set forth in paragraph "7" of the Complaint.
8. The defendants lack sufficient knowledge or information to determine the truth of the allegations in paragraph "8" of the Complaint.

9. The Defendants lack sufficient knowledge or information to determine the truth of the allegations in paragraph “9” of the Complaint.
10. Defendants admit the allegations set forth in paragraph “10” of the Complaint.
11. Defendants admit the allegations set forth in paragraph “11” of the Complaint.
12. Defendants admit the allegations set forth in paragraph “12” of the Complaint.
13. Defendants admit the allegations set forth in paragraph “13” of the Complaint.
14. The Defendants lack sufficient knowledge or information to determine the truth of the allegations in paragraph “14” of the Complaint.
15. The Defendants lack sufficient knowledge or information to determine the truth of the allegations in paragraph “15” of the Complaint.
16. The Defendants deny the allegations in paragraph “16” of the Complaint.
17. Defendants admit the allegations set forth in paragraph “18” of the Complaint.
18. Defendants admit the allegations set forth in paragraph “19” of the Complaint.
19. The Defendants lack sufficient knowledge or information to determine the truth of the allegations in paragraph “20” of the Complaint regarding allegations regarding a religious event.
20. Defendants deny the allegations in paragraph “20” of the Complaint regarding communication with Francis Tran and conversation between Karin Zakarian and Jack Ross asking if Plaintiff may leave early.
21. Defendants deny that Karin Zakarian is an “executive” manager as alleged in paragraph “20” of the Complaint.

22. Defendants admit that Plaintiff had requested on December 1, 2011, that she be permitted to leave work a few hours later on that same day, as alleged in paragraph "20".
23. Defendants deny the allegations set forth in paragraph "21" of the Complaint.
24. Defendants deny the allegations set forth in paragraph "22" of the Complaint.
25. Defendants deny the allegations set forth in paragraph "23" of the Complaint.
26. Defendants deny the allegations set forth in paragraph "24" of the Complaint.
27. Defendants admit that Plaintiff did not come back to work on December 2, 2011, as alleged in paragraph "25" of the Complaint. However, Defendants deny the allegations set forth in paragraph "25" of the Complaint with regard to Plaintiff being informed she had no job.
28. Defendants deny the allegations set forth in paragraph "26" of the Complaint.
29. Defendants deny the allegations set forth in paragraph "27" of the Complaint.
30. Defendants deny the allegations set forth in paragraph "29" of the Complaint.
31. Defendants deny the allegations set forth in paragraph "30" of the Complaint.
32. Defendants deny the allegations set forth in paragraph "31" of the Complaint.
33. Defendants lack sufficient knowledge or information to determine the truth of the allegations in paragraph "33" of the Complaint.
34. The Defendants lack sufficient knowledge or information to determine the truth of the allegations in paragraph "34" of the Complaint.
35. Defendants deny the allegations set forth in paragraph "35" of the Complaint.
36. Defendants deny the allegations set forth in paragraph "37" of the Complaint.

37. Defendants deny the allegations set forth in paragraph "38" of the Complaint.

II
DEFENSES

38. This Court lacks jurisdiction over Ross Metals Corp., on grounds the corporation was not served pursuant to Rule 4(h) of the Federal Rules of Civil Procedure.

WHEREFORE, Defendants pray for judgment dismissing the Complaint and enter Judgment in favor of Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Forest Hills, New York
July 23, 2012



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